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26 UNITED STATES DISTRICT COURT  
27 NORTHERN DISTRICT OF CALIFORNIA

28 SHELA CAMENISCH, et al.,  
Plaintiffs,  
vs.  
UMPQUA BANK,  
Defendant.

CASE NO.: 5:20-cv-05905-PCP

**DEFENDANT UMPQUA BANK'S  
UNOPPOSED ADMINISTRATIVE  
MOTION TO ALLOW REMOTE  
APPEARANCE AT APRIL 3, 2025  
HEARING**

Date: April 3, 2025  
Trial Date: April 28, 2025  
Judge: Hon. P. Casey Pitts

Pursuant to Civil Local Rule 7-11 and the Court's Standing Order for Civil Cases, Defendant Umpqua Bank ("Umpqua") files this administrative motion respectfully requesting that its counsel, Kasey J. Curtis of Reed Smith LLP, be permitted to attend the hearing set for April 3, 2025 at 10:00 am remotely via Zoom. Plaintiffs do not oppose this request. Declaration of Kasey J. Curtis ("Curtis Decl.") ¶ 6.

Mr. Curtis has pre-existing travel plans with his family and his three young children, who will be on Spring Break from elementary school from March 31, 2025 through April 4, 2025. Curtis Decl., ¶ 2. It will therefore be very difficult for Mr. Curtis to travel San Jose to appear in person at the hearing. Curtis Decl., ¶¶ 3-4. Mr. Curtis would, however, be available to attend the hearing via Zoom. Curtis Decl., ¶ 4.

Mr. Curtis' presence at the hearing would be beneficial to Umpqua as he has been representing Umpqua in this case since early 2022 and was the principal author of the post-trial motions that will be argued at the April 3, 2025 hearing. Curtis Decl., ¶ 5. Umpqua's other attorneys, including Umpqua's lead counsel, Keith Ketterling, will attend the hearing in person. Curtis Decl., ¶ 5.

Based on the foregoing, Umpqua respectfully requests that Mr. Curtis be granted leave to attend the April 3, 2025 hearing remotely via Zoom.

DATED: March 14, 2025

REED SMITH LLP

By: /s/ Kasey J. Curtis  
 Kasey J. Curtis  
 Charles P. Hyun  
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 Katherin Goetz  
 Attorneys for Defendant  
 UMPQUA BANK

**DECLARATION OF KASEY J. CURTIS**

I, Kasey J. Curtis, declare under penalty of perjury as follows:

1. I am an attorney with the law firm of Reed Smith LLP, one of the law firms representing Defendant Umpqua Bank (“Umpqua”) in connection with this action. This declaration is based on my personal knowledge and if called to testify to the following facts I could and would competently do so.

2. My three kids—who are in first and fourth grades—will be on Spring Break from March 31, 2025 through April 4, 2025. Prior to the scheduling of the April 3, 2025 hearing, I made plans with my wife and kids to travel to Catalina Island from April 1, 2025 through April 5, 2025 for my kids’ Spring Break. These travel plans included non-refundable, pre-paid ferry tickets and lodging in Avalon, California. Because I had been focused on the trial, and these plans were not on my work calendar, I did not remember these travel plans when the Court set the April 3, 2025 hearing at the conclusion of trial.

3. It is fairly difficult to get from Catalina Island to San Jose, California. The ferry crossing from Catalina Island back to Long Beach takes approximately an hour and a half and runs 4 times a day on weekdays. The ferry also requires that passengers be present at the ferry terminal approximately a half our before the ferry leaves. From Long Beach, one would have to travel to the airport and take a flight from either the Long Beach Airport or Los Angeles Airport to San Jose, California.

4. The entire process would likely take 5-6 hours, each way. Because of the difficulty in traveling between Catalina Island and San Jose, California, I would likely be unable to attend the April 3, 2025 hearing in person. I would, however, be able to attend remotely, via Zoom. Umpqua’s other attorneys will attend the hearing in person.

5. I have been working on this case since Spring 2022 and am the principal author of the post-trial motions that are set to argued on April 3, 2025. Accordingly, I believe it would be helpful to the Court’s decisional process if I was able to attend the April 3, 2025 hearing and could participate in argument.

